

**CC Docket 94-102**

**Enhanced 911 Tier III Interim Report**

**South #5 RSA Limited Partnership**

**d/b/a Brazos Cellular Communications, Ltd.**

**September 1, 2005**

South #5 RSA Limited Partnership d/b/a Brazos Cellular Communications, Ltd. ("Brazos Cellular") is a Tier III CMRS carrier that operates a cellular radiotelephone service system in Texas RSA 5B2 - Hardeman. This report is submitted in accordance with the provisions of the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems and E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket 94-102, (released April 1, 2005).

**Item 1: Number and Status of Phase I and Phase II Requests from Public Safety Answering Points (PSAPs)**

All three PSAPs located within Brazos Cellular's service area have requested and are receiving Phase I data.

Brazos has not received any requests from the local PSAPs for Phase II services.

**Item 2: Carrier's Specific Technology Choice**

Brazos Cellular has formally elected to deploy a handset-based solution for delivery of E911 Phase II services on the CDMA network system which Brazos Cellular began to install during the fourth quarter of 2004. It is expected that the CDMA system will completely overlay the TDMA system, on all nine activated cell sites, by the end of September 2005.

**Item 3: Status of Ordering and/or Installation of Necessary Network Equipment**

Brazos Cellular has completed installation and testing of equipment necessary to transmit Phase I data to PSAPs. The services of TeleCommunications Systems, Inc. have been

utilized to coordinate with PSAPs, test and operate the E911 Phase I capabilities of Brazos Cellular's TDMA network system.

Brazos Cellular's CDMA network system likewise provides Phase I data to local PSAPs. Phase I services are coordinated with and delivered to PSAPs via the CDMA network in a consistent manner. Optimization for delivery of Phase II data will be conducted when the PSAPs request Phase II services.

**Item 4: Date on Which Phase II Service Was/Will First Be Available in the Carrier's Network**

Brazos Cellular will coordinate Phase II service to begin when one or more local PSAPs become capable of receiving and processing Phase II services. Brazos Cellular will remain in contact with the PSAPs to assess their planned capabilities and anticipated timing of requests for Phase II services. To date, the PSAPs have not indicated to Brazos Cellular a schedule for commencing Phase II services.

**Item 5(a): Automatic Location Identity ("ALI")-Capable Handset Availability**

Brazos Cellular is currently selling E911 Phase II compliant handsets throughout its service area. Brazos Cellular has experienced no particular difficulty obtaining ALI-capable handsets at reasonable prices.

**Item 5(b): Information on Progress Towards Ensuring that Ninety-Five Percent of the Carrier's Subscriber Base Has Location-Capable Handsets.**

Brazos Cellular has met the benchmarks assigned to it by the FCC in the Order released on April 1, 2005. Brazos Cellular began selling and activating ALI-capable handsets on February 28, 2005, well ahead of the FCC appointed date of July 1, 2005. By the benchmark date of July 1, 2005, 62% of phones newly activated on Brazos Cellular's network were ALI-capable, well exceeding the required 25% threshold for July 1, 2005. By August 5, 2005, 70% of digital phones newly activated on Brazos Cellular's network were ALI-capable. Therefore, Brazos Cellular already has met its obligation to assure that by September 1, 2005, 50% of handsets activated are ALI-capable. Brazos Cellular's next benchmark will be to assure that by December 31, 2005, 100% of handsets activated are ALI-capable.

Brazos Cellular conducts a marketing campaign to encourage existing subscribers to trade in older handsets for ALI-capable handsets. Brazos Cellular offers no charge trade-

ins of TDMA phones, with no early termination fee of the existing TDMA contract. Brazos Cellular has given away free ALI-capable handsets. It promotes a CDMA plan that provides to the subscriber more minutes than does the TDMA plan. These and other efforts inure to the financial detriment of Brazos Cellular, but they are undertaken in a good faith effort to meet the FCC's handset compliance requirements.

The FCC, in the Order released on April 1, 2005, gave Brazos a thirteen month extension, through January 31, 2007, to achieve a 95% systemwide penetration rate of ALI-capable handsets on its system. As of August 15, 2005, the penetration rate was 24.28%. Brazos Cellular will extend its best efforts to meet the 1/31/07 deadline. However, Brazos Cellular foresees a formidable challenge in enticing substantial numbers of customers to switch to CDMA ALI-capable handsets. Brazos Cellular enjoys a low churn rate, and experiences natural customer resistance to learning and programming new features on new phones. Some customers strongly prefer to use their TDMA and 3-watt analog phones, particularly in the rural and farmland areas of Brazos Cellular's service territory where the older phones are more reliable and provide better service. Without these higher powered phones, many callers would find themselves in remote areas where they cannot reach a 911 operator at all. Such circumstances jeopardize consumers' access to emergency services